

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AUTOMOBILE CLUB OF NEW YORK, INC. :
d/b/a AAA NEW YORK and AAA NORTH
JERSEY, INC., : 11 Civ. 6746
Plaintiffs, : (RKE) (HBP)
-against- : **NOTICE OF MOTION TO**
THE PORT AUTHORITY OF NEW YORK : **COMPEL DISCOVERY**
AND NEW JERSEY, :
Defendant.
-----X

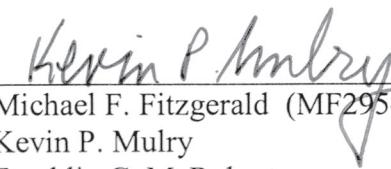
PLEASE TAKE NOTICE, that upon the accompanying papers, and all proceedings had herein, plaintiffs Automobile Club of New York, Inc. d/b/a AAA New York and AAA New Jersey, Inc. will move this Court before the Honorable Henry B. Pitman at the United States District Court, at 500 Pearl Street, New York, New York, on a date to be determined by the Court, for an order pursuant to Federal Rules of Civil Procedure 26 and 37(a), for an order compelling the production of documents withheld by defendant pursuant to the deliberative process privilege, and for such other and further relief as may be just, proper, and equitable.

Dated: New York, New York
August 6, 2013

Respectfully Submitted,

FARRELL FRITZ, P.C.

By:


Michael F. Fitzgerald (MF2954)
Kevin P. Mulry
Franklin C. McRoberts
Attorneys for Plaintiffs
370 Lexington Avenue, Suite 800
New York, New York 10017
(212) 687-1230

TO: Alexander H. Southwell, Esq.
GIBSON DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166-0193
(212) 351-3981
Fax: (212) 351- 6281

Kathleen Gill Miller, Esq.
JAMES M. BEGLY, ESQ.
225 Park Avenue South, 13th Floor
New York, New York 10003
(212) 435-3435

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